

RE: Question about Emergencies Act: PCMLTFA, FINTRAC, and PSPs

From: "Fraser, Kirsten" <kirsten.fraser@fin.gc.ca>
To: Personal Info. [REDACTED]@paytechs.ca>
Cc: "Brown, Justin" <justin.brown@fin.gc.ca>, "Davidson, Charlene" <charlene.davidson@fin.gc.ca>, Personal Info. [REDACTED]@nanopay.net>
Date: Fri, 18 Feb 2022 15:28:45 +0000

Thanks Personal Info. [REDACTED]

Sounds good. I am confirming that I have sent an invite for 3pm today.

Available for any questions ahead of the meeting.

Kirsten

Personal Info. [REDACTED]

From: Personal Info. [REDACTED]@paytechs.ca>
Sent: Thursday, February 17, 2022 9:52 PM
To: Fraser, Kirsten <Kirsten.Fraser@fin.gc.ca>
Cc: Brown, Justin <Justin.Brown@fin.gc.ca>; Davidson, Charlene <Charlene.Davidson@fin.gc.ca>; Personal Info. [REDACTED]@nanopay.net>
Subject: Re: Question about Emergencies Act: PCMLTFA, FINTRAC, and PSPs

I don't think it would be feasible to round up our members for a meeting tomorrow or Monday. Our membership is roughly 40 companies and I'd need to give them a bit more notice.

I think it would be a good starting point for Personal Info. [REDACTED] and I to meet with you tomorrow and level set on what these changes mean for the sector.

Based on what we discuss, we can go from there and plan something for the broader membership if we discover these changes will have widespread effects?

My working assumption has been they won't, at least for our membership, but this has all been happening so fast I'm not sure I totally understand the changes and what they mean.

On Thu, Feb 17, 2022 at 9:42 PM Fraser, Kirsten <Kirsten.Fraser@fin.gc.ca> wrote:

Hi Personal Info. [REDACTED]

Thanks for your quick reply that's great, I think to be of the greatest value we were also hoping to include some of your members.

Do you think that is feasible in that time frame? Happy to chat first thing in the am + to provide any support in coordinating.

Kirsten

From: Personal Info. [REDACTED] <[REDACTED]@paytechs.ca>
Sent: Thursday, February 17, 2022 9:03 PM
To: Fraser, Kirsten <Kirsten.Fraser@fin.gc.ca>
Cc: Brown, Justin <Justin.Brown@fin.gc.ca>; Davidson, Charlene <Charlene.Davidson@fin.gc.ca>;
Personal Info. [REDACTED] <[REDACTED]@nanopay.net>
Subject: Re: Question about Emergencies Act: PCMLTFA, FINTRAC, and PSPs

Kirsten,

Thanks for your email.

Personal [REDACTED] and I are able to meet at 3pm tomorrow. Will you send out the Teams invite?
Personal [REDACTED] is cc'd so that you can add Personal [REDACTED] to the event.

Looking forward to talking!

Have a great night,

Pers
[REDACTED]

On Thu, Feb 17, 2022 at 8:46 PM Fraser, Kirsten <Kirsten.Fraser@fin.gc.ca> wrote:

Good Evening Personal [REDACTED],

Apologies for the late night email - my name is Kirsten Fraser and I am a Senior Analyst on Justin's team. I am following up on your earlier correspondence regarding payment service provider responsibilities under the *Emergency Economic Measures Order*.

We thought it would be useful to set up some time for Finance Canada officials to brief your members and provide an opportunity to have any outstanding questions addressed. We would work with you to coordinate and we envision you and Personal [REDACTED], attending on your end as well.

Given the urgency, we'd like to set something up as quickly as possible, ideally either tomorrow (Friday, February 18th) or Monday/Tues next week. Can you let me know at your earliest possible convenience if coordinating this is feasible – right now we would be looking at the following times.

Friday, Feb 18th – 3:00 p.m.

Monday, Feb 21st – 1:00 pm or 3:00 p.m

Happy to speak directly via Teams or at Personal [REDACTED] and will be at my desk all am tomorrow.

Regards,

Kirsten

Personal Info. [REDACTED]

From: Personal Info. [REDACTED]@paytechs.ca>
Sent: Thursday, February 17, 2022 5:08 PM
To: Brown, Justin <Justin.Brown@fin.gc.ca>
Cc: Davidson, Charlene <Charlene.Davidson@fin.gc.ca>; Fraser, Kirsten <Kirsten.Fraser@fin.gc.ca>
Subject: Re: Question about Emergencies Act: PCMLTFA, FINTRAC, and PSPs

Thanks, Justin! Am I free to share this with my members?

Personal Info. [REDACTED]
Personal Info. [REDACTED]
PayTechs of Canada

☐ Personal [REDACTED]
☐ Person [REDACTED]@paytechs.ca
☐ www.paytechs.ca

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On Wed, 16 Feb 2022 at 18:53, Brown, Justin <Justin.Brown@fin.gc.ca> wrote:

Hi Pers [REDACTED]

Apologies for the delay. Please see answers to your questions below. If you require any further information, we will do our best.

Who Must Register With FINTRAC?

Under the [Emergency Economic Measures Order](#), crowdfunding platforms and payment service providers must register with FINTRAC if they are in possession or control of property that is owned, held, or controlled by, or on behalf of, an individual or entity that is engaged, directly or indirectly, in an activity which is prohibited in sections 2 to 5 of the *Emergency Measures Regulations* (See below). Money Services Businesses which are already registered

with FINTRAC, and which meet the criteria above, must also update their registration should they operate a crowdfunding platform or perform functions of a payment service provider.

What are the prohibited activities listed in the *Emergency Measures Regulations* made under the Order?

The prohibited activities set out in the [Emergency Measures Regulations](#) are the following:

1. Participation in a public assembly that may reasonably be expected to lead to a breach of the peace by:

- The serious disruption of the movement of persons or goods, or the serious interference with trade;
 - The interference with the functioning of critical infrastructure; or
 - The support of the threat or use of acts of serious violence against persons or property
- It is also prohibited to bring a person under 18 to such a public assembly.

2. Entry into Canada by a foreign national with the intent to participate in, or facilitate a public assembly, other than where exemptions apply.

3. Travel to, or within, an area where a public assembly is taking place.

- It is also prohibited to bring a person under 18 to travel to, or within 500 meters of an area where a public assembly is taking place, except where exemptions apply (eg. travel by an employee or agent of the Government of Canada, or a province who is acting in the execution of their duties).

4. Use of property to support a public assembly

- It is prohibited to use, collect, provide, make available, or invite a person to provide property to facilitate or participate in any public assembly - or for the purpose of benefiting any person who is facilitating or participating in such an activity.

Thanks and best regards,

Justin Brown
Senior Director | Directeur principal
Financial Crimes Policy | Politique sur les crimes financiers
Financial Sector Policy Branch | Direction de la politique du secteur financier
Department of Finance Canada | Ministère des Finances Canada
Tel: **Personal Info.**
E-mail: Justin.Brown@fin.gc.ca

From: **Personal Info.** <s@paytechs.ca>

Sent: Tuesday, February 15, 2022 2:20 PM

To: Brown, Justin <Justin.Brown@fin.gc.ca>; Davidson, Charlene

<charlene.davidson@fin.gc.ca>

Subject: Re: Question about Emergencies Act: PCMLTFA, FINTRAC, and PSPs

Matthew, thanks so much for the e-introduction! (moved to bcc)

Justin, Charlene -- any help would be appreciated. I'm sensing confusion and a bit of anxiety across the sector, with some unsure what to do. Though I'm hearing a lot, the big question is who needs to register and who doesn't. Though many payment service providers are already registered with FINTRAC, not all are.

Any idea where I could get this information?

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Personal Info.

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On Tue, 15 Feb 2022 at 14:09, Shannon, Matthew <Matthew.Shannon@fin.gc.ca> wrote:

Good Afternoon Pers;

Nice to hear from you, I hope all is going well now that you are well and settled in your role. Unfortunately, while I can't much help to you directly, Justin/Charlene cc'd are well placed to give you some guidance and the best means to connect with FINTRAC regarding more operational questions.

Many Thanks,
Matt

From: Personal Info. <Person@paytechs.ca>

Sent: Tuesday, February 15, 2022 1:59 PM

To: matthew.shannon@canada.ca

Subject: Question about Emergencies Act: PCMLTFA, FINTRAC, and PSPs

Hi Matthew,

Long time no talk! Reaching out in light of the announcement yesterday about payment service providers. I'm getting a lot of questions from my members about what they need to do, if anything, to comply.

Do you know who I could talk to in order to get basic information about what the new measures mean for payment service providers who aren't registered with FINTRAC? E.g., which ones do need to register and which ones don't?

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